

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

WOLLMUTH MAHER & DEUTSCH LLP

Paul R. DeFilippo, Esq.
500 Fifth Avenue
New York, New York 10110
Telephone: (212) 382-3300
Facsimile: (212) 382-0050
pdefilippo@wmd-law.com

JONES DAY

Gregory M. Gordon, Esq.
Brad B. Erens, Esq.
Dan B. Prieto, Esq.
Amanda Rush, Esq.
2727 N. Harwood Street
Dallas, Texas 75201
Telephone: (214) 220-3939
Facsimile: (214) 969-5100
gmgordon@jonesday.com
bberens@jonesday.com
dbprieto@jonesday.com
asrush@jonesday.com
(Admitted *pro hac vice*)

ATTORNEYS FOR DEBTOR

In re:

LTL MANAGEMENT LLC,¹

Debtor.

Chapter 11

Case No.: 23-12825 (MBK)

Judge: Michael B. Kaplan

**ORDER (A) APPROVING FORM
AND MANNER OF NOTICE OF HEARING ON
DISCLOSURE STATEMENT; (B) APPROVING DISCLOSURE
STATEMENT; (C) ESTABLISHING SOLICITATION AND TABULATION
PROCEDURES; (D) SCHEDULING A HEARING ON CONFIRMATION
OF AMENDED CHAPTER 11 PLAN AND APPROVING FORM AND MANNER OF
NOTICE THEREOF; AND (E) GRANTING RELATED RELIEF**

The relief set forth on the following pages is hereby **ORDERED**.

¹ The last four digits of the Debtor's taxpayer identification number are 6622. The Debtor's address is 501 George Street, New Brunswick, New Jersey 08933.

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Caption: Order (A) Approving Form and Manner of Notice of Hearing on Disclosure Statement; (B) Approving Disclosure Statement; (C) Establishing Solicitation and Tabulation Procedures; (D) Scheduling a Hearing on Confirmation of Amended Chapter 11 Plan and Approving Form and Manner of Notice Thereof; and (E) Granting Related Relief

This matter coming before the Court on the *Debtor's Motion for Entry of Order*

(A) Approving Form and Manner of Notice of Hearing on Disclosure Statement; (B) Approving Disclosure Statement; (C) Establishing Solicitation and Tabulation Procedures; (D) Scheduling a Hearing on Confirmation of Amended Chapter 11 Plan and Approving Form and Manner of Notice Thereof; and (E) Granting Related Relief [Dkt. ____] (the "Motion"),² filed by the debtor in the above-captioned case (the "Debtor"), pursuant to sections 105(a), 502, 1125, 1126, and 1128 of the Bankruptcy Code, Bankruptcy Rules 2002, 3003, 3016, 3017, 3018, 3020, 9006, and 9008 and Local Bankruptcy Rules 3018-1, 9013-1 and 9013-2; the Court having reviewed the Motion and having heard the statements of counsel regarding the relief requested in the Motion at a hearing before the Court (the "Hearing"); the Court finding that (i) the Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334 and the Standing Order of Reference, (ii) venue is proper in this district pursuant to 28 U.S.C. §§ 1408 and 1409, (iii) this is a core proceeding pursuant to 28 U.S.C. § 157(b), (iv) the relief requested in the Motion and granted herein is warranted under the circumstances and is in the best interests of the Debtor's estate and creditors; the Court having determined that the legal and factual bases set forth in the Motion and at the Hearing establish just cause for the relief granted in this Solicitation Procedures Order, it is hereby **FOUND AND DETERMINED THAT:**

- A. Notice of the Disclosure Statement Hearing, provided in the manner described in the Motion, was sufficient and appropriate under the circumstances and complied with

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- the applicable requirements of the Bankruptcy Code, Bankruptcy Rules and the Local Bankruptcy Rules, and no further notice is needed.
- B. The Disclosure Statement contains “adequate information” within the meaning of section 1125 of the Bankruptcy Code, and no further information is necessary or required.
- C. The Disclosure Statement complies with Bankruptcy Rule 3016(c) and describes, in specific and conspicuous language, the acts to be enjoined and the entities subject to the injunction, exculpation and release provisions contained in the Plan.
- D. The contents of the Solicitation Packages and other notices, as set forth in the Motion, comply with Bankruptcy Rules 2002 and 3017 and constitute sufficient notice of the Voting Record Date, the Voting Deadline, the procedures described to solicit votes to accept or reject the Plan, the Plan objection deadline, the Plan, the Confirmation Hearing and related matters to all interested parties.
- E. The Solicitation Procedures attached hereto as Exhibit 2 provide a fair and equitable voting process and are consistent with section 1126 of the Bankruptcy Code and the applicable Bankruptcy Rules and Local Bankruptcy Rules.
- F. The forms of Ballots attached hereto as Exhibits 3-1, 3-2, 3-3, and 3-4 including all instructions provided therein, (a) are sufficiently consistent with Official Form No. 14 to be approved, (b) adequately address the particular needs of the Chapter 11 Case,

² Capitalized terms not otherwise defined herein have the meanings given to them in the Motion or the *Amended Chapter 11 Plan of Reorganization of LTL Management LLC*, dated June 26, 2023, as it may be amended (the “Plan”).

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- and (c) are appropriate for the Class of Claims or Interests entitled to vote to accept or reject the Plan. No further information or instructions are necessary.
- G. Ballots need not be provided to holders of Claims or Interests in any Class other than Class 4 (Talc Personal Injury Claims) and Class 6 (Equity Interests of the Debtor) because all other Classes are conclusively presumed to have accepted the Plan in accordance with section 1126(f) of the Bankruptcy Code because they are Unimpaired.
- H. The proposed form and manner of Notice of Non-Voting Status substantially in the form attached hereto as Exhibit 4 and the Contract/Lease Notice substantially in the form attached hereto as Exhibit 5 are sufficient and appropriate under the circumstances and are consistent with section 1126 of the Bankruptcy Code and the applicable Bankruptcy Rules and Local Bankruptcy Rules. No further notice is deemed necessary or required.
- I. The proposed form and manner, in addition to the timing and procedures for responding to, the Direct Talc Personal Injury Claim Solicitation Notice and Certified Plan Solicitation Directive, substantially in the forms attached hereto as Exhibits 6-1 and 6-2, are sufficient and appropriate under the circumstances and satisfy all relevant Bankruptcy Rules and Local Bankruptcy Rules.
- J. The period during which the Debtor may solicit votes on the Plan is a reasonable and adequate period of time for holders of Claims entitled to vote on the Plan to make an informed decision to accept or reject the Plan and timely return Ballots evidencing such decision.

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- K. The combination of direct and published notice of the Plan and Confirmation Hearing, as set forth in the Motion and the Supplemental Notice Plan, provides good and sufficient notice of the Plan, the Confirmation Hearing and the opportunity to vote on and object to the Plan, complies with Bankruptcy Rules 2002 and 3017, satisfies all other applicable Bankruptcy Rules and Local Bankruptcy Rules, and satisfies the requirements of due process with respect to all known and unknown creditors.
- L. The Debtor's letter in support of the Plan attached hereto as Exhibit 7-3 is appropriate under the circumstances.
- M. The AHC of Supporting Counsel's letter in support of the Plan attached hereto as Exhibit 7-5 is appropriate under the circumstances.

NOW, THEREFORE, IT IS HEREBY ORDERED THAT:

- 1. The Motion is GRANTED, as set forth herein. Any objections or responses to the Motion that have not been withdrawn, waived or settled prior to the entry of this order are hereby overruled.

I. Disclosure Statement Hearing Notice and Disclosure Statement

- 2. The Disclosure Statement Hearing Notice attached hereto as Exhibit 1-1 and Exhibit 1-2 and the manner of service and publication thereof are each APPROVED.
- 3. The Disclosure Statement is APPROVED as containing "adequate information" within the meaning of section 1125 of the Bankruptcy Code.
- 4. All objections to the Disclosure Statement that have not been withdrawn or resolved

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previously or at the hearing to consider the Disclosure Statement are overruled.

II. Plan Solicitation and Confirmation Schedule

5. The following dates and deadlines in connection with the Solicitation Procedures and Confirmation Hearing are APPROVED:

EVENT	DATE ³
Deadline for Law Firms Representing Talc Personal Injury Claims to Return Certified Plan Solicitation Directive and Client List	August 15, 2023
Voting Record Date	Date of entry of the order approving this Motion
Deadline to Mail Solicitation Packages and Related Notices, including Direct Talc Personal Injury Claim Solicitation Notice	August 31, 2023 (the “ <u>Solicitation Date</u> ”), which is 7 business days after entry of the order approving the Disclosure Statement, or as soon as reasonably practicable thereafter
Date of Publication of Confirmation Hearing Notice	On the Solicitation Date (or as soon thereafter as reasonably practicable)
Deadline to File Plan Supplement	October 20, 2023
Voting Deadline	October 30, 2023, at 4:00 p.m.
Confirmation Objection Deadline	
Deadline to File Voting Certification	November 13, 2023, at 4:00 p.m.
Deadline for the Debtor to File Memorandum of Law, any Reply and Declarations in Support of Plan Confirmation, and Form of Confirmation Order	November 13, 2023, at 4:00 p.m.
Confirmation Hearing	November 20, 2023, subject to the Court’s availability

6. The Confirmation Hearing shall be held on November 20, 2023 and shall continue to

³ All times in this table are prevailing Eastern Time.

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the extent necessary on such additional dates as the Court may designate. The Confirmation Hearing may be adjourned from time to time by this Court or the Debtor without further notice other than as indicated in any notice or agenda of matters scheduled for a particular hearing that is filed with the Court.

7. Any other dates and deadlines requested to be approved in the Motion or otherwise set forth in the Solicitation Procedures are APPROVED.

III. Solicitation Procedures

8. The procedures for the solicitation and tabulation of votes on the Plan, including the Solicitation Procedures attached hereto as Exhibit 2 and as set forth below, are APPROVED in all respects.

Voting Record Date

9. Pursuant to Bankruptcy Rule 3017(d), [_____, 2023] shall be the record date for purposes of determining which creditors and interest holders are entitled to receive a Solicitation Package and, where applicable, vote on the Plan (the “Record Date”).
10. Holders of a transferred Claim will not be entitled to receive a Solicitation Package or cast a Ballot on account of such transferred Claim unless (a) all actions necessary to effect the transfer of the Claim pursuant to Bankruptcy Rule 3001(e) have been completed prior to the Record Date, or (b) the transferee files by the Record Date (i) the documentation required by Bankruptcy Rule 3001(e) to evidence the transfer and (ii) a sworn statement of the transferor supporting the validity of the transfer.

Solicitation Packages

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11. The proposed distribution and contents of the Solicitation Packages, which shall include the following, are APPROVED:
 - a. a cover letter describing (i) the contents of the Solicitation Package, (ii) the contents of any enclosed USB flash drive and instructions for use of the USB flash drive, and (iii) information about how to obtain access to, free of charge, the Plan, the Disclosure Statement, this Order approving the Disclosure Statement, together with the exhibits thereto, and any other documents mentioned in the Solicitation Package;
 - b. the Confirmation Hearing Notice;
 - c. copies (in electronic format) of the Disclosure Statement with all exhibits, including the Plan with its exhibits (to the extent such exhibits are filed with the Court prior to entry of this Order);
 - d. this Order, excluding any exhibits thereto (in electronic format);
 - e. solely for holders of Talc Personal Injury Claims, as applicable, and Equity Interests of the Debtor, an appropriate Ballot and voting instructions for the same;
 - f. solely for holders of Talc Personal Injury Claims, as applicable, and Equity Interests of the Debtor, a pre-addressed, postage prepaid return envelope for completed Ballots; and
 - g. letters from the Debtor and the AHC of Supporting Counsel, which letters will be in substantially the forms attached hereto as Exhibits 7-3 and 7-5, respectively, recommending the acceptance of the Plan.
12. The Debtor shall transmit, or cause to be transmitted, the Solicitation Packages to the Solicitation Parties identified in the Motion, on or before **August 31, 2023** or as soon as reasonably practicable thereafter.
13. As part of the Solicitation Packages, copies of the Disclosure Statement, the Plan, this Order and exhibits to all of such documents, shall be provided in an electronic format

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- (including a USB flash drive) instead of printed hard copies. The cover letter included in the Solicitation Package shall include instructions for obtaining printed copies of the materials free of charge. The Debtor may substitute hard copies of all solicitation materials instead of electronic copies as may be necessary to achieve timely distribution of the Solicitation Packages.
14. The Debtor and the Solicitation Agent shall not be required to mail a Solicitation Package or any other materials related to voting or confirmation of the Plan to any person or entity from which the notice of the Motion or other mailed notice in this case was returned as undeliverable by the postal service, unless the Solicitation Agent is provided with accurate addresses for such persons or entities before the Solicitation Date, and failure to mail Solicitation Packages or any other materials related to voting or confirmation of the Plan to such persons or entities shall not constitute inadequate notice of the Confirmation Hearing or the Voting Deadline and shall not constitute a violation of Bankruptcy Rule 3017(d).
15. The Debtor shall distribute a copy of the Confirmation Hearing Notice and Notice of Non-Voting Status to the holders of Claims in the Non-Voting Classes and to the holders of Unclassified Claims, and the Debtor and the Solicitation Agent shall not be required to distribute a Solicitation Package or any other materials related to voting or confirmation of the Plan to the holders of Claims in Non-Voting Classes or holders of Unclassified Claims.
16. The Debtor shall not be required to distribute Solicitation Packages or a Notice of Non-Voting Status to counterparties to the Debtor's Executory Contracts and Unexpired Leases who do not have scheduled Claims or Claims based upon filed Proofs of Claim. Rather, in lieu thereof, and in accordance with Bankruptcy Rule

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3017(d), the Debtor shall mail to the counterparties to the Debtor's Executory Contracts and Unexpired Leases the Contract/Lease Notice attached hereto as Exhibit 5.

Ballots

17. The forms of Ballots, substantially in the form attached hereto as Exhibits 3-1, 3-2, 3-3, and 3-4, including the instructions attached to each Ballot, are APPROVED in all respects.

Notice of Non-Voting Status

18. The form, manner and scope of the mailed Notice of Non-Voting Status attached hereto as Exhibit 4 is APPROVED in all respects. The Debtor is authorized to submit the Notice of Non-Voting Status to holders of Claims in Non-Voting Classes and holders of Unclassified Claims and shall not be required to distribute Solicitation Packages or any other materials related to voting to the holders of such Claims.

Contract/Lease Notice

19. The form, manner and scope of the Contract/Lease Notice attached hereto as Exhibit 5 is APPROVED in all respects. The Debtor is authorized to submit the Contract/Lease Notice to counterparties to Executory Contracts and Unexpired Leases.

Distribution of Solicitation Packages to Firms and Voting by Firms

20. The form of Direct Talc Personal Injury Claim Solicitation Notice and Certified Plan Solicitation Directive attached hereto as Exhibits 6-1 and 6-2, respectively, are APPROVED in all respects.

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21. Each Firm of record for holders of Direct Talc Personal Injury Claims was required to return a Certified Plan Solicitation Directive and submit a Client List to the Solicitation Agent by **August 15, 2023**.
22. The Solicitation Agent will not publicly disclose or share any Client List(s) with any other party absent an order from a court of competent jurisdiction.
23. The Solicitation Agent shall serve the Solicitation Packages in accordance with the instructions set forth in the Certified Plan Solicitation Directive on or before **August 31, 2023** or as soon as reasonably practicable thereafter. To the extent Client Lists are not submitted by the deadline set forth in paragraph 21 above but are received prior to the Solicitation Date, the Debtor and the Solicitation Agent shall distribute Solicitation Packages for the affected Clients as soon as reasonably practicable after the receipt of such lists.
24. If an attorney fails to submit a Certified Plan Solicitation Directive and a Client List to the Solicitation Agent by the deadline set forth paragraph 21 above, the Firm will be deemed to have directed the Solicitation Agent to solicit votes on the Plan from holders of Direct Talc Personal Injury Claims whom the attorney represents according to the Indirect Solicitation Method described in section IV of the Solicitation Procedures; provided that such Firm must submit a certified list of Clients in the form and manner required by the Certified Plan Solicitation Directive so that such certified list of Clients is received by the Solicitation Agent with an affidavit of service filed by such Firm.

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25. To be entitled to vote to accept or reject the Plan, a holder of a Direct Talc Personal Injury Claim in Class 4 (or its⁴ Firm) shall be required to certify that (a) such holder reasonably believes they have a Direct Talc Personal Injury Claim as of the Voting Record Date, (b) such holder has a medical diagnosis of Mesothelioma or Gynecologic Cancer (each as defined in the Solicitation Procedures) supported by medical records or similar documentation regarding the person who has or had such disease, and (c)(i) with respect to holders asserting a diagnosis of Gynecologic Cancer, (1) that the holder has consistently used J&J Talc Products (as defined in the Solicitation Procedures) in the perineal area for a minimum of four consecutive years and (2) was newly diagnosed with Gynecologic Cancer at least ten years following first use of J&J Talc Products, and, (ii) with respect to holders asserting a diagnosis of Mesothelioma, (1) that the holder consistently used J&J Talc Products for a minimum of four consecutive years, (2) was newly diagnosed with Mesothelioma at least ten years following first use of J&J Talc Products, (3) has not alleged and will not allege that exposure to asbestos or alleged asbestos contamination in any product other than one or more J&J Talc Products or other talcum powder product(s) caused or contributed to his/her Mesothelioma, and (4) the holder has not sought, will not seek, and has not previously received compensation for alleged exposure to asbestos from any source other than J&J Talc Products or other talcum powder product(s).
26. If a Firm elects the Master Ballot Solicitation Method, the votes of holders of Direct Talc Personal Injury Claims recorded on the Master Ballot will not be counted unless the Firm recording such votes makes the certifications required to complete the

⁴ Wherever from the context it appears appropriate, each term stated in either the singular or the plural will include both the singular and the plural, and pronouns stated in the masculine, feminine, or neuter gender will include the masculine, feminine, and neuter gender.

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Certified Plan Solicitation Directive and Master Ballot including, among other things, that the Firm has complied with all Solicitation Procedures governing the Master Ballot Solicitation Method and that each Direct Talc Personal Injury Claim vote recorded on the Exhibit to the Master Ballot reflects the informed decision of a Client of the Firm, in addition to the certifications set forth in paragraph 25 above with respect to each holder of a Direct Talc Personal Injury Claim whose vote is reflected on the Exhibit to the Master Ballot. If it is the Firm's customary and accepted practice to collect and record authorizations or instructions from its Clients by mail, email, telephone, text or other standard communication methods, including any digital communications, the Firm shall be authorized to follow such customary practices to collect and record the votes of its Clients. Firms may transmit the Solicitation Packages to their Clients by mail, email, telephone, text or other standard communication methods, including any digital communications. If a Firm is unable to make any of the above certifications with respect to a Client, the attorney may not record a vote for such Client and must timely send the information relating to the name, address, and email (if known) of such Client or holder of a Claim to the Solicitation Agent, and the Solicitation Agent shall exercise reasonable efforts to distribute a Solicitation Package to such Client as soon as reasonably practicable.

27. If a Firm selects the Indirect Solicitation Method or the Hybrid Solicitation Method and requests that the Solicitation Agent send Solicitation Packages to the Firm for transmission to holders of Direct Talc Personal Injury Claims represented by such Firm, such Firm shall (a) deliver the Solicitation packages within three Business Days of receipt from the Solicitation Agent and (b) file an affidavit of service with this Court within three Business Days of such service and provide a copy to the Solicitation Agent. The affidavit of service does not need to list the names and

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addresses of the Clients served, but should state that service was completed, the date(s) service was completed, and that for the Clients served the Firm has provided the Solicitation Agent with a certified list of such Clients with a duly executed Certified Plan Solicitation Directive or as set forth in paragraph 24. Firms conducting service according to this paragraph 27 may transmit Solicitation Packages according to the Firm's customary practices by mail, email, telephone, text or other standard communication methods, including any digital communications. Nothing herein prevents the Firms from including a cover letter or other communication from the Firm to its Clients with the Solicitation Packages; provided that if a Firm elects for the Solicitation Agent to deliver Solicitation Packages to its Clients, the Firm must indicate on its Certified Plan Solicitation Directive whether a cover letter will be included in the Solicitation Package sent to such Clients.

28. The solicitation method used to solicit votes from one or more Clients represented by a Firm may be changed only if such change is agreed to among the Firm, the Debtor, and the Solicitation Agent.
29. The Debtor is authorized to cause Solicitation Packages to be distributed to the Firm of record for holders of Direct Talc Personal Injury Claims entitled to vote on the Plan in lieu of serving a Solicitation Package on each individual claimant. Holders of Direct Talc Personal Injury Claims entitled to vote on the Plan shall have the exclusive ability to vote their Claims regardless of whether their Firm chooses to solicit, collect, record, and submit the vote of the claimant in question. Holders of Direct Talc Personal Injury Claims entitled to vote on the Plan shall have the ability to request a Solicitation Package directly from the Solicitation Agent.

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Procedures for Vote Tabulation

30. If an Indirect Talc Personal Injury Claim is not listed in the Schedules or is listed as contingent, unliquidated, disputed, in the amount of \$0.00, or unknown, and a Proof of Claim was not (i) timely filed by the applicable Claims Bar Date or (ii) deemed timely filed by an order of the Court before the Voting Deadline, unless the Debtor has consented in writing, such Claim shall be disallowed for voting purposes with respect to the Plan.
31. All Talc Personal Injury Claims in Class 4 of the Plan that are not disallowed pursuant to paragraph 30 shall be allowed in the amount of \$1.00 in the aggregate per claimant solely for purposes of voting to accept or reject the Plan and not for any other purpose. For the avoidance of doubt, this Order establishes the value of each Claim in Class 4 for voting purposes under Rule 3018, which value shall not be subject to challenge after the date hereof.
32. To be counted as votes to accept or reject the Plan, all Ballots must be properly executed, completed and delivered to the Debtor's Solicitation Agent either by (a) properly completing a Ballot through the electronic Ballot submission platform on the Solicitation Agent's website (the "Voting Portal") available at <https://dm.epiq11.com/ltl>, (b) mail in the return envelope provided with each Ballot, (c) overnight courier, or (d) personal delivery, so that in each case, all Ballots are actually received by the Solicitation Agent no later than 4:00 p.m. (prevailing Eastern Time) on **October 30, 2023** (the "Voting Deadline"). The Voting Agent is authorized to accept Ballots via electronic transmission through the Voting Portal, but shall not be required to accept Ballots via facsimile, email or other means of electronic or online transmission.

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33. As Solicitation Agent in this Chapter 11 Case, Epiq shall process and tabulate Ballots and file the Voting Certification no later than **November 13, 2023**. A Ballot shall not be counted if:

- a. The Ballot is submitted by or on behalf of a claimant not entitled to vote pursuant to the Solicitation Procedures;
- b. The Ballot is not actually received by the Solicitation Agent in the manner set forth in the Solicitation Procedures by the Voting Deadline, unless the Debtor shall have granted an extension of the Voting Deadline with respect to such Ballot, or this Court shall have granted such an extension;
- c. The Ballot is returned to the Solicitation Agent indicating acceptance or rejection of the Plan but is unsigned, provided, however, for the avoidance of doubt, a Ballot that is properly submitted electronically via the Voting Portal on the Solicitation Agent's website shall be deemed to contain an original signature;
- d. The Ballot is illegible or contains insufficient information to permit the identification of each claimant whose vote is reflected on the Ballot;
- e. The Ballot is transmitted to the Solicitation Agent by facsimile or other electronic means other than by online transmission through the Voting Portal on the Solicitation Agent's website;
- f. The Ballot is submitted in an inappropriate form for such Claim;
- g. The Ballot is returned to the Solicitation Agent: (i) indicating neither acceptance nor rejection of the Plan; (ii) indicating both acceptance and rejection of the Plan; or (iii) indicating partial rejection and partial acceptance of the Plan; or
- h. The Ballot is not completed, including, without limitation, (i) a Master Ballot on which the attorney fails to make the required certifications, (ii) a Master Ballot that fails to include the required Exhibit, (iii) solely with respect to the vote of a holder of a Direct Talc Personal Injury Claim whose information is not provided, a Ballot

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submitted by or on behalf of the holder of a Direct Talc Personal Injury Claim that does not (a) provide the last four digits of the claimant's Social Security Number or indicate that the claimant does not have a Social Security Number and (b) provide, for claimants who do not have a Social Security Number, the claimant's month, date, and year of birth or (iv) a Ballot submitted by or on behalf of a holder of a Direct Talc Personal Injury Claim or an Interest Holder that does not include the required certifications.

Confirmation Procedures

34. The form, manner and scope of the Confirmation Hearing Notice and the Publication Notice attached hereto as Exhibits 7-1 and 7-2, respectively, and the Supplemental Notice Plan, as set forth in the *Declaration of Shannon R. Wheatman, Ph.D in Support of Supplemental Notice Plan* attached hereto as Exhibit 7-4, constitute good, sufficient, and adequate notice to all parties, including known and unknown creditors, comply with due process and are APPROVED. Such notices, together with the Notice of Non-Voting Status and the Contract/Lease Notice, are being provided by means reasonably calculated to reach all interested persons, reasonably convey all the required information to inform all persons affected thereby, and provide a reasonable time for a response and an opportunity to object to the relief requested.
35. Objections and responses, if any, to confirmation of the Plan must (a) be in writing, (b) conform to the Bankruptcy Rules and the Local Bankruptcy Rules; (c) state the name, address, telephone number and email address of the objecting party and the amount and nature of the Claim or Interest of such entity, if any; (d) state with particularity the basis and nature of any objection to the Plan, including any evidentiary support thereof, and, if practicable, a proposed modification to the Plan that would resolve such objection; and (e) be filed, contemporaneously with a proof

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Debtor: LTL Management LLC

Case No. 23-12825-MBK

Caption: Order (A) Approving Form and Manner of Notice of Hearing on Disclosure Statement; (B) Approving Disclosure Statement; (C) Establishing Solicitation and Tabulation Procedures; (D) Scheduling a Hearing on Confirmation of Amended Chapter 11 Plan and Approving Form and Manner of Notice Thereof; and (E) Granting Related Relief

of service, with this Court and served upon the parties at the addresses listed in the Confirmation Hearing Notice by no later than the Confirmation Objection Deadline.

36. Objections to confirmation of the Plan not timely filed and served in accordance with the provisions of this Order shall not be considered by this Court and are denied and overruled unless otherwise ordered by this Court.
37. The Debtor or other parties in interest may file and serve a consolidated memorandum of law and reply in support of confirmation of the Plan on or before the Confirmation Reply Deadline.

Additional Relief

38. The Debtor is authorized to take any action necessary or appropriate to implement the terms of and the relief granted in this Order without seeking further order of this Court.
39. The Debtor is authorized to make any non-substantive changes to the exhibits to this Order without further order of this Court, including, without limitation, changes to (a) correct any typographical, grammatical, and formatting errors or omissions before their mailing to parties in interest or publication, and (b) modify the Publication Notice as necessary or desirable for purposes of providing notice in foreign publications.
40. Notice of the Motion as provided therein shall be deemed good and sufficient notice of such Motion and the requirements of the Bankruptcy Rules and Local Bankruptcy Rules are satisfied by such notice.
41. Notwithstanding any applicable Bankruptcy Rule, the terms and conditions of this

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Debtor: LTL Management LLC

Case No. 23-12825-MBK

Caption: Order (A) Approving Form and Manner of Notice of Hearing on Disclosure Statement;
(B) Approving Disclosure Statement; (C) Establishing Solicitation and Tabulation Procedures;
(D) Scheduling a Hearing on Confirmation of Amended Chapter 11 Plan and Approving Form
and Manner of Notice Thereof; and (E) Granting Related Relief

Order shall be immediately effective and enforceable upon its entirety.

42. This Court shall retain jurisdiction to hear and determine all matters arising from or related to the implementation, interpretation, or enforcement of this Order.